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DOCKET Gederal Combining Commission Office of Secretary

February 6, 2006

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

> Re: EB Docket No. 06-36 Certification of CPNI Filing

Dear Ms. Dortch:

On behalf of Tri County Telephone Association, Inc. and its subsidiary, TCT WEST, Inc., enclosed herewith for filing with the Commission are an original and four copies of its certification in response to the Commission's Public Notice, DA 06-223, released January 30, 2006.

Should there be any questions concerning this filing, please contact the undersigned.

Respectfully submitted,

Ramsey L. Woodworth

Cc: Byron McCoy

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Hadridans Oth Charebe



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Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Federal Communications Commission
Office of Secretary

Re: Certification of CPNI Filing EB-06-TC-060 EB Docket No. 06-36

Dear Ms. Dortch:

This is in response to the Commission's Public Notice, DA 06-223 released January 30, 2006, directing all telecommunications carriers to file compliance certifications as required by Section 64.2009(e) of the Commission's rules. Tri County Telephone Association, Inc., and its subsidiary, TCT WEST, Inc., provide telecommunications services to approximately 6,373 customers in the rural Big Horn Basin area of north central Wyoming. In accordance with the FCC's customer proprietary network information ("CPNI") rules, it is our policy to use CPNI only for the purpose of marketing its telecommunications services to existing customers within the permitted scope of Section 64.2005 of the rules, titled "Use of customer proprietary information without customer approval." This limited use does not require customer approval under the express terms of Section 64.2005. This policy has been communicated to all employees having access to CPNI data and is monitored by management.

FCC Rule Section 64.2009 requires the implementation of "a system by which the status of a customer's CPNI can be clearly established prior to the use of CPNI," including the requirement in Section 64.2009(e) concerning the signing of an annual compliance certificate confirming the establishment of such system and procedures to ensure compliance. As the status of the customer's CPNI approval does not need to be established for such limited use without customer approval permitted under Section 64.2005, Tri County Telephone Association and TCT WEST have understood that the requirements of Section 64.2009 are inapplicable to such limited use and a system is not required to monitor the status of circumstances which do not exist.

In submitting this response, Tri County Telephone Association, Inc., and TCT WEST, Inc. certify based on their understanding of the CPNI rules set forth above that it is compliant with the Commission's CPNI rules.

Respectfully submitted,

By: Donald C. Jackson
Regulatory Manager